



Attorney General  
Betty D. Montgomery

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October 18, 1999

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VIA OVERNIGHT DELIVERY

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
Portals II Building  
Room TWA325  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: *In the Matter of Access Charge Reform,*  
CC Docket No. 96-262;  
*In the Matter of Price Cap Performance Review*  
*for LECs, CC Docket No. 94-1;*  
*In the Matter of Low-Volume Long Distance*  
*Users, CC Docket No. 99-249;*  
*In the Matter of Federal-State Joint Board On*  
*Universal Service, CC Docket No. 96-45.*

Dear Ms. Salas:

Enclosed please find the original and forty (40) copies of the Memorandum submitted by the Public Utilities Commission of Ohio in support of the National Association of Regulatory Utility Commissioners' Request to Extend the Comment Cycle in the above referenced dockets, relative to the proposal of the Coalition for Affordable Local and Long Distance Services. This document was also submitted through the FCC's electronic comment filing system in each of the four dockets (confirmation number 19991018634308). Please time stamp and return one copy to me in the enclosed self-addressed stamped return envelope.

Thank you for your attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Steven T. Nourse".

Steven T. Nourse  
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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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In the Matter of )

Access Charge Reform; )

Price Cap Performance Review )

for Local Exchange Carriers; )

Low-Volume Long Distance Users; )

Federal-State Joint Board On Universal Service) )

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CC Docket No. 96-262

CC Docket No. 94-1

CC Docket No. 99-249

CC Docket No. 96-45

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**THE PUBLIC UTILITIES COMMISSION OF OHIO'S MEMORANDUM IN  
SUPPORT OF THE NATIONAL ASSOCIATION OF REGULATORY UTILITY  
COMMISSIONERS' REQUEST TO EXTEND THE TIME FOR FILING COMMENTS**

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**Counsel on behalf of  
The Public Utilities Commission of Ohio**

## **THE PUBLIC UTILITIES COMMISSION OF OHIO SUPPORTS NARUC'S REQUEST TO EXTEND THE COMMENT CYCLE**

Pursuant to Sections 1.46 and 1.44 of the Federal Communication Commission's ("FCC" or "Commission") General Rules of Practice and Procedure, 47 C.F.R. Sections 1.46 and 1.44 (1999), the National Association of Regulatory Utility Commissioners ("NARUC") has requested that the Commission extend the time for filing comments in these proceedings an additional fourteen (14) days to November 12, 1999 for initial comments and to December 3, 1999 for Replies. The Public Utilities Commission of Ohio (Ohio Commission) supports NARUC's request for an extension.

The Ohio Commission agrees with NARUC that the Coalition for Affordable Local and Long Distance Services (CALLS) proposal clearly raises a host of issues of direct and critical concern to State commissions. As such, and given the timing of NARUC's annual convention, a brief extension of the comment cycle in this docket is eminently reasonable. The Ohio Commission agrees with NARUC that the comments in this docket be extended until after the NARUC annual convention, so that the NARUC members can meaningfully discuss the issues raised by the CALLS proposal. Moreover, the Ohio Commission submits that the timing of the FCC's scheduled decision in the Universal Service docket (CC Docket 96-45) also independently warrants an extension of the comment cycle in this docket. In particular, the Ohio Commission submits that the FCC's expected Universal Service decision needs to be examined and considered in the context of the significant Universal Service implications of the CALLS proposal. Clearly, the FCC's Universal Service decision must be assimilated and understood prior to any additional Universal Service reforms being considered.

## CONCLUSION

For the foregoing reasons, the Ohio Commission respectfully requests that the FCC grant NARUC's request to extend the comment cycle in this docket.

Respectfully submitted,

**Betty D. Montgomery**  
Attorney General



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